REMARKS

In the Office Action,[1] the Examiner objected to claim 6, and rejected claims 1-17 under 35 U.S.C. § 103(a) as unpatentable over US Patent No. 6,973,625 to Lupo et al. ("*Lupo*") in view of U.S. Patent Publication No. 2004/0122971 to Joshi et al. ("*Joshi*"). Applicant respectfully traverses the rejection presented in the Office Action.

By this amendment, Applicant amends claims 1 and 7-14, and adds new claims 18 and 19. Claims 1-19 are therefore pending following entry of this amendment.

I. The Telephonic Interview of June 24, 2008

Applicant would like to thank the Examiner for the telephone interview of June 24, 2008 with Applicant's representative. The Examiner suggested that Applicant amend claim 1 to state whether the client or server detects the changes to the user interface. Accordingly, Applicant has amended claim 1 to recite "detecting, by a client, multiple changes to a user interface" (emphasis added), in accordance with the Examiner's suggestion.

Applicant's representative also discussed new dependent claim 18 with the Examiner.

II. The Objection to Claim 6

The Examiner objected to claim 6 because "Applicant[] indicated that claim 6 is amended" in the Amendment After Final submitted January 25, 2008, but did not amend

[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

claim 6 (Office Action at p. 2). Applicant has designated claim 6 as "Original" in this Response, and respectfully requests that the Examiner withdraw the objection.

III. The Rejection of Claims 1-17 Under 35 U.S.C. § 103(a)

Applicant respectfully requests that the Examiner withdraw the rejection of claims 1-17 because a *prima facie* case of obviousness has not been established with respect to these claims.

Claim 1, for example, recites a computer-implemented method for providing information to a screen reader, comprising "filtering, by the client, the rendering requests to eliminate redundant rendering requests, the redundant rendering requests being identical to or a subset of another rendering request." The applied references do not teach or suggest at least this feature of claim 1.

Lupo discloses a "framework and method of programming web-based interfaces using management classes for the management of behavior regarding specific web elements wherein said code relating to said management classes is loaded into a user's browser" (*Lupo*, abstract). *Lupo* also discloses "making parts of a screen invisible until a user selects a specific check box or radio button" (*Lupo*, col. 5, lines 30-32). However, the Examiner concedes that *Lupo* does not disclose filtering redundant rendering requests. Therefore, *Lupo* fails to teach or suggest the claimed "filtering, by the client, the rendering requests to eliminate redundant rendering requests, the redundant rendering requests being identical to or a subset of another rendering request," as recited by independent claim 1.

Joshi fails to cure the deficiencies of *Lupo*. First, *Joshi* does not disclose "filtering ... redundant rendering requests being identical to or a subset of another rendering request." The Office Action incorrectly alleges that *Joshi* discloses this feature.

Joshi discloses a technique for selectively reloading frames of a multiframe Web page, by reloading multiple frames in response to a single client request message (*Joshi*, abstract). In *Joshi's* technique, a "dirty bit" is used to track the status of each frame in a multiframe web page (*Joshi*, ¶ 39). When a client sends a frame refresh request to the server, the server reviews a queue of dirty frames to determine what other frames need to be refreshed (*Joshi*, ¶ 40). The server then removes redundant or duplicate entries on the dirty frames queue. When the client sends a request for new content in a given frame, the server signals the client that the client should subsequently request content for frames on the dirty frames queue (*Joshi*, ¶ 50).

Joshi's removal of redundant entries from the dirty frames queue cannot correspond to the claimed "filtering ... redundant rendering requests being identical to or a subset of another rendering request." First, *Joshi's* entries on the "dirty frames" queue are not rendering requests. The structure in *Joshi* that may be analogous to the claimed "rendering requests" is, at best, *Joshi's* client requests for new frame content, and *Joshi* does not disclose filtering or eliminating redundant client requests. At best, *Joshi* prevents some rendering requests from ever being generated, by limiting the frequency with which the server signals the client to generate a new request. However,

Joshi does not filter rendering requests which have already been generated, whereas the claimed rendering requests are both "generat[ed]" and "filter[ed]."

Moreover, the claimed filtering of redundant rendering requests is done "by the client." As discussed, at best, *Joshi* "filters" the entries on the dirty frames queue, not rendering requests. Moreover, any such "filtering" of the entries on the dirty frames queue is done by *Joshi's* server, and not by a client. Therefore, *Joshi* fails to teach or suggest the claimed "filtering, by the client, the rendering requests to eliminate redundant rendering requests, the redundant rendering requests being identical to or a subset of another rendering request," as recited by independent claim 1.

Applicants note that the combination of *Lupo* and *Joshi* does not cure the individual deficiencies of the references discussed above. *Lupo* discloses "state management" that "prevents incorrect or incomplete information from being sent to [a] Web server." (*Lupo*, col. 5, lines 23-26). Even assuming that this language in *Lupo* implies some client-side processing, such processing is limited to "disabling and enabling buttons and other components" of a Web page (*Lupo*, col. 5, lines 25-26), not doing any client-side filtering of rendering requests. Thus, the proposed combination would, at best, move *Joshi's* tracking of dirty frames over to *Lupo's* client. The resulting client would, at best, track dirty frames on a queue and eliminate redundant entries on the queue, but would not eliminate redundant rendering requests that had already been generated.

For at least the above reasons, the cited references do not render obvious claim 1, and a *prima facie* case of obviousness has not been established. Therefore, the

Examiner should withdraw the rejection of claim 1 under 35 U.S.C. § 103(a) and allow independent claim 1.

Independent claims 7 and 13, although of different scope from claim 1, are distinguishable from the cited references for at least reasons similar to those discussed above with respect to claim 1. Therefore, the Examiner should also withdraw the rejection of claims 7 and 13 under 35 U.S.C. § 103(a) and allow these independent claims.

Claims 2-6 and 15-17 depend from independent claim 1, claims 8-12 depend from independent claim 7, and claim 14 depends from independent claim 13. These dependent claims are allowable at least due to their dependence on the independent claims. Accordingly, the Examiner should also withdraw the rejection of dependent claims 2-6, 8-12, and 14-17 and allow these dependent claims.

IV. New Claims 18 and 19

New dependent claim 18 is allowable over the cited at least due to its dependence from allowable claim 1. Moreover, neither *Lupo* nor *Joshi* discloses or suggests a "user interface element[] [that] filters its own rendering requests."

New independent claim 19 is allowable over the cited art, at least because neither *Lupo* nor *Joshi* discloses or suggests "filtering, by the user interface element, the rendering requests to eliminate redundant rendering requests that are identical to or a subset of another one of the rendering requests" (emphasis added).

V. Conclusion

In view of the foregoing remarks, Applicant submits that this claimed invention, is neither anticipated nor rendered obvious in view of the cited art. Applicant therefore requests the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our Deposit Account No. 06-0916.

Respectfully submitted,

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